

Robert D. Nosek, Esq.  
CERTILMAN BALIN ADLER & HYMAN, LLP.  
Counsel to Berone Capital Partners LLC,  
Berone Capital LLC, Berone Capital Equity Fund I, LLP,  
405 Motorsports LLC f/k/a Berone Capital Equity Partners LLC  
Jeremiah Beguesse and Fabian Stone  
90 Merrick Avenue  
East Meadow, New York 11554  
Telephone (516) 296-7000

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 11

PRIME CAPITAL VENTURES, LLC

Case No. 24-11029-1-rel

Debtor.

-----X

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE**, that Certilman Balin Adler & Hyman, LLP, hereby appears as counsel for Berone Capital Partners LLC, Berone Capital LLC, Berone Capital Equity Fund I, LLP and 405 Motorsports LLC f/k/a Berone Capital Equity Partners LLC (collectively, “Berone”) and Jeremiah Beguesse and Fabian Stone (collectively the “Barone Principals, and collectively with Berone the “Berone Witnesses”), in the above-captioned case pursuant to Rules 2002, 9007, 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Rules”), and section 1109(b) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), enters its appearance in the above-referenced chapter 11 case, and request that copies of any and all notices and papers filed or entered in this case be given to and served upon the following:

**CERTILMAN BALIN ADLER & HYMAN, LLP**  
**90 Merrick Avenue, 9<sup>th</sup> Floor**  
**East Meadow, New York 11554**  
**(516) 296-7000**  
**Attention: Robert D. Nosek, Esq.**  
**E-Mail: [rnosek@certilmanbalin.com](mailto:rnosek@certilmanbalin.com)**

**PLEASE TAKE FURTHER NOTICE**, that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the rules and sections specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex or otherwise that (1) effects or seeks to affect in any way rights or interests of any creditor or party in interest in this case, with respect to (a) the Debtor in the above-captioned case and any related adversary proceedings, whether currently pending or later commenced (the “Debtor”); (b) property of the Debtor’s estate, or proceeds thereof, in which the Debtor may claim in interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtor’s Trustee may seek to use; or (2) requires or seeks to require any act or other conduct by a party in interest.

**PLEASE TAKE FURTHER NOTICE** that this notice of appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive the rights of Berone Parties: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims actions, defenses,

setoffs, or recoupments to which Berone Parties are or may be entitled under agreements in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this notice is not intended as, and shall not be Berone Parties' consent to the entry of final orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, absent consent of Berone Parties cannot enter final orders or judgments in any such case, proceeding, matter, or controversy, as applicable, consistent with Article III of the United States Constitution.

Dated: East Meadow, New York  
June 18, 2025

**CERTILMAN BALIN ADLER & HYMAN, LLP**  
Attorneys for Counsel to Berone Capital Partners LLC,  
Berone Capital LLC, Berone Capital Equity Fund I, LLP,  
405 Motorsports LLC f/k/a Berone Capital Equity  
Partners LLC Jeremiah Beguesse and Fabian Stone

By: /s/Robert D. Nosek  
**ROBERT D. NOSEK**  
90 Merrick Avenue  
East Meadow, New York 11554  
(516) 296-7000  
[rnosek@certilmanbalin.com](mailto:rnosek@certilmanbalin.com)

TO:

Prime Capital Ventures LLC  
187 Wolf Road, Suite 300-20  
Attention: Manager  
Albany, NY 12205-1138

Christian H. Dribusch, Esq.  
Dribusch Law Firm  
187 Wolf Road Suite 300-30  
Albany, NY 12205

Lauren Kiss, Esq.  
Klestadt Winters Jureller Southard &  
Stevens, LLP.  
200 West 41<sup>st</sup> Street  
17<sup>th</sup> Floor  
New York, NY 10036

Fred Stevens, Esq.  
Klestadt Winters Jureller Southard &  
Stevens, LLP.  
200 West 41<sup>st</sup> Street  
17<sup>th</sup> Floor  
New York, NY 10036

Yann Geron- Trustee  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1208  
New York, NY 10017

Lisa M. Penapraze, Esq.  
Office of the United States Trustee  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Room 620  
Albany, NY 12207

U.S. Trustee  
Office of the U.S. Trustee  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Room 620  
Albany, NY 12207